

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

LAUREN ASHLEY MORGAN; ERIK
BARNES; SHERRY BASON; LOIS WINN;
GEORGES EMMANUEL NJONG DIBOKI;
JULIA SIMS; and SOPHIA WOODLAND,
Individually and on Behalf of All Others
Similarly Situated,

Plaintiffs,

v.

REALPAGE, INC.; GREYSTAR REAL
ESTATE PARTNERS, LLC; LINCOLN
PROPERTY CO.; CUSHMAN & WAKEFIELD,
INC.; FPI MANAGEMENT, INC.; RPM
LIVING, LLC; BH MANAGEMENT
SERVICES, LLC; MIDAMERICA
APARTMENT COMMUNITIES, INC.;
MORGAN PROPERTIES, LLC; AVENUE5
RESIDENTIAL, LLC; BOZZUTO
MANAGEMENT COMPANY; AVALONBAY
COMMUNITIES, INC.; HIGHMARK
RESIDENTIAL, LLC; EQUITY
RESIDENTIAL; THE IRVINE COMPANY,
LLC; ESSEX PROPERTY TRUST, INC.; ZRS
MANAGEMENT, LLC; CAMDEN PROPERTY
TRUST; UDR, INC.; CONAM
MANAGEMENT CORPORATION;
CORTLAND PARTNERS, LLC; THRIVE
COMMUNITIES MANAGEMENT, LLC;
SECURITY PROPERTIES INC.; CWS
APARTMENT HOMES, LLC; PROMETHEUS
REAL ESTATE GROUP, INC.; SARES REGIS
GROUP OPERATING,

Defendants.

Case No. 3:23-md-03071-WDC
MDL: 3071

3:23-cv-00378
3:23-cv-00380
3:23-cv-00391
3:23-cv-00552
3:23-cv-00742
3:23-cv-00979

**MOTION TO WITHDRAW COUNSEL AS
ATTORNEY OF RECORD**

MOTION TO WITHDRAW AS ATTORNEY OF RECORD

Pursuant to LR 83.01(g), Plaintiffs hereby move the Court to withdraw Steven N. Williams of Joseph Saveri Law Firm, LLP as counsel for Plaintiffs. Mr. Williams is no longer a partner at Joseph Saveri Law Firm and will no longer be active in this action.

Good cause exists for allowing Mr. Williams to withdraw because Plaintiffs are still represented in this matter by Joseph R. Saveri, Cadio Zirpoli, Kevin E. Rayhill, and Kathleen J. McMahon of Joseph Saveri Law Firm, as well as Plaintiffs' Interim Co-Lead Counsel, Liaison Counsel, and the other Counsel appointed by the Court to the Plaintiffs' Steering Committee. *See* ECF No. 278. Allowing Mr. Williams to withdraw will not delay trial or other pending matters in the case.

For the foregoing reasons, Plaintiffs respectfully ask the Court to grant their motion to withdraw Mr. Williams as counsel of record.

Dated: December 19, 2023

Respectfully Submitted,

By: /s/ Joseph R. Saveri
Joseph R. Saveri

Joseph R. Saveri (*Pro Hac Vice*)
Cadio Zirpoli (*Pro Hac Vice*)
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*Counsel for Plaintiffs and the Proposed Class and
Members of the Plaintiffs' Steering Committee*

CERTIFICATE OF SERVICE

I hereby certify that on December 19th, I caused the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Joseph R. Saveri
Joseph R. Saveri